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January 13, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

RE: CC Docket No. 92-105/NSD File No. L-98-139

Dear Ms. Roman Salas:

Enclosed is the required diskette and a hard copy of the filing made today by the United States Telephone Association in the above-referenced docket. Should you have any questions or concerns, please feel free to phone me at (202) 326-7250.

Sincerely,

A large, stylized handwritten signature in black ink, which appears to read "Robyn L.J. Davis".

Robyn L.J. Davis
Legal Assistant

Enclosures (2)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of)	
)	
The Use of N11 Codes and Other)	CC Docket No. 92-105
Abbreviated Dialing Arrangements)	NSD File No. L-98-139

COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION

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SUMMARY

The Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council (NANC) Regarding Abbreviated Dialing Arrangements should be adopted by the Commission. The Working Group investigated different options for abbreviated dialing and concluded that most of those options were neither practical nor useful. USTA concurs with this determination and urges the Commission to find that implementation of uniform multinetwork abbreviated dialing procedures is not appropriate at this time and should not be pursued.

The process of developing the NANC Report was open to all industry participants and provided a forum for full discussion of issues. The high level of participation yielded many areas of agreement, the remainder of which are left to be resolved through the administrative process. This procedure was superior to subjecting all issues to the full administrative decision-making process.

The specific findings of the Report emphasize the shortcomings of the different abbreviated dialing options for multinetwork applications that were evaluated by the Working Group. USTA agrees with the conclusion that abbreviated dialing resources should not be utilized for POTS and/or carrier access applications or for speed calling arrangements. USTA also supports the Report's recommendation that any abbreviated dialing format adopted should be configured to provide the maximum number of codes possible without reaching the number of digits used in ordinary dialing sequences. USTA agrees that N11 and Vertical

Service Codes should not be used for abbreviated dialing. Abbreviated dialing sequences should be dialable in a uniform manner by all callers. USTA cautions that development and implementation of assignment guidelines would require significant industry resources that are not readily available. Other arrangements are currently available and should be considered as alternatives to abbreviated dialing.

USTA believes that existing use of codes should not be disrupted in favor of implementing abbreviated dialing arrangements. Also, USTA agrees with the Report's conclusion that the only viable use for multinetwork application for the remaining N11 codes should be for a service gateway. USTA concurs with the Report's conclusion that alternatives for abbreviated dialing for multinetwork applications, such as leading or trailing "#" or leading "*", would require development of the signaling protocol. Switch owners could not control all the details of service provision, which may result in regulatory requirements of per code blocking. USTA also finds that issues related to methods by which calls would be billed are critical for the Commission to consider.

USTA addresses a number of allegations raised by Low Tech Designs, Inc. and MCI Worldcom in their minority opinions to the Report and finds that those allegations are without merit and should be rejected by the Commission.

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Abbreviated Dialing Arrangements)	NSD File No. L-98-139

**COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association (USTA) hereby submits its comments on the Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council (NANC) Regarding Abbreviated Dialing Arrangements in the above-captioned proceeding (hereinafter referred to as "the NANC Report" or "the Report").¹ USTA is the principal trade association of the local exchange carrier (LEC) industry. Its members provide over 95 percent of the exchange carrier-provided access lines in the United States.

The NANC Report responds to the Commission's request to explore the necessity for additional abbreviated dialing arrangements and the technical feasibility of implementing these arrangements. The Ad Hoc Working Group found that most of the options available were undesirable for various reasons. USTA comments on the process,

¹Public Notice, DA 98-2541, released December 14, 1998.

the specific findings of the Report, and the minority opinions to the Report. USTA advocates adoption of the NANC Report by the Commission.

I. Comments on the Process

USTA participated in the activity of development of the NANC Report and commends the industry for engaging in this activity. The process involved spirited discussion of differing points of view. Nonetheless, the Report represents a consensus of the participants. It must be noted, however, that some individual participants disagreed with some of the consensus conclusions. The minority opinions are evidence of that situation.

The process was valuable because it did establish a baseline of discussion, understanding of terms and the issues, and revealed many areas of agreement. What is left are the issues of such contention that they must be resolved through the administrative process. While this process is difficult and time consuming, USTA believes that it will yield a better result than what would be achieved if all elements and issues of the debate were subject to the full administrative decision-making process.

USTA commends the industry participants of all points of view for their participation, patience and dedication to this process. It should also be noted that, as evidenced in Section 3.0 "Background," the results of this inquiry align quite well with the results of a previous industry inquiry. We also observe that the procedures and processes used in this Working Group, formed under the NANC, were derived from and are very similar to the open forum process. USTA offers that this is a testament to the validity and

effectiveness of forum procedures currently utilized in the industry.

II. Comments on the Report

A. Section 5.2 “Service Application”

USTA supports the Report’s conclusion that abbreviated dialing resources should not be utilized for POTS and/or carrier access applications or for speed calling arrangements. Any use of abbreviated dialing for multinetwork applications should be thoroughly understood as having a compelling need for assignment because it would consume a scarce numbering resource and would consume significant industry resources to implement.

B. Section 5.3 “Availability”

USTA supports the recommendation that any format adopted for abbreviated dialing be configured to provide the maximum number of codes possible without reaching the number of digits used in ordinary dialing sequences - 7 digits. Longer dialing sequences might provide greater numbers of codes, but then could not be termed “abbreviated.”

USTA also concurs that N11 codes (virtually fully utilized) and Vertical Service Codes (VSCs) not be considered for use for abbreviated dialing. The resource represented by unassigned N11 codes is hardly worth the effort that would be required by the industry and the Commission to utilize them as abbreviated codes in the context of this proceeding. VSCs are also currently in use for specific applications, and like other codes in current use, should not be disturbed. The basis for these recommendations is further explored in subsequent sections of the Report.

C. Section 5.4 “Dialing Protocols”

USTA supports the specific element of the Report that abbreviated dialing sequences be dialable in a uniform manner by all callers. The necessity of presubscription would violate that principle, as would the need (or option) to dial carrier access codes or any other sequence that would compel the call to be routed in a unique manner. The only exception identified as an acceptable unique dialing condition would be in deference to specific regulatory requirements to prefix a toll indicator, and this with the obvious condition that it be technically feasible.

D. Section 5.5 “Assignment Practices”

Underlying the first paragraph in this section is the recognition that implementation of abbreviated dialing would require the formulation of assignment guidelines. The same issue is also discussed in Section 9.0 “Implementation Considerations.” Development of assignment guidelines is a considerable task, and USTA observes that the resources in the industry that would develop these guidelines are fully occupied with other work activities and are likely to continue to be so for the foreseeable future. This is the first point in these comments where USTA questions the wisdom of utilizing industry resources to implement a service or capability of questionable value given the limited resources available and the many other challenges facing the industry at this time.

E. Section 5.6 “Alternative, Existing Numbering Resources”

Working Group discussions reviewed the existing alternative resources available to information service providers. These resources require the use of seven or ten digit dialing; they are available now and can be used in many ways. The Working Group concluded that “abbreviated dialing” arrangements were inappropriate as a means of accessing some services currently provided using these existing resources. These arrangements are currently available, and many of them are not well utilized. USTA accordingly states that the existence of these options and their flexibility tend to discount the need for additional resources which would require industry effort and significant cost to implement.

F. Section 6.0 “Intranetwork Applications”

This segment of the Report reviews the uses concerning existing use of codes for intranetwork applications. Any new abbreviated dialing arrangements that would interfere with existing applications brought protests from those entities who would have to abandon or modify those uses. Regardless of individual persuasions, these applications have developed over significant amounts of time, and it is a fair question whether or not it is appropriate to force users of existing arrangements to abandon those uses, especially when significant usage exists and modification would disrupt existing service offerings and require the current users to incur considerable costs to make necessary modifications.

USTA concludes that the need to compel overturning of existing arrangements, regardless of where they have been implemented, might be required in the case of an

overwhelming public need to do so. USTA believes that in this instance, no such case can be made to justify such displacement. In addition, this situation teaches again the lesson that modern service providers tend to be entrepreneurial in utilizing resources available to them. They have done that, and many of the formats considered, if ordered, would cause considerable hardship for carriers that would have to abandon or modify existing uses. USTA believes that if a numbering resource is to be subject to specific limitations in use, those restrictions must be established at the outset so that all service providers are aware of the risk of unique usage. In USTA's view, there is no way to disturb these current applications without causing significant disruption to one carrier or group of carriers to the benefit of another. At this late date, and for the anemic purposes of supporting abbreviated dialing arrangements, we support the consensus view that existing uses not be disturbed.

G. Section 7.1 "N11 Codes"

Again, USTA supports the Report's conclusions that the only viable use of the extremely limited remaining N11 resource for multinetwork application is in the form of use as a service gateway. Whether or not the complexity of developing such applications would be worth the effort could be the subject of further inquiry into the viability of this specific application. USTA recommends that the industry not now expend the valuable resources necessary to implement this application based on the challenges now before the industry and the principle of not disturbing existing uses.

H. Section 7.2 "Vertical Service Codes"

USTA fundamentally supports the conclusion that VSCs have established use in the industry and that the format should not be extended to represent network addresses. USTA is acutely aware of the recommendation of Low Tech Designs, Inc. that expansion of this format is their preferred approach, and that their "independent research" ² indicates that this format could be easily expanded. USTA fundamentally disagrees. For widespread assignment of any code as an abbreviated dialing arrangement on an internetwork basis, all switches accessible to customers of telecommunications service providers³ would have to be modified to accept the digits and transmit them across network boundaries. Such an expansion would also result in customer confusion and the necessity for switches to implement timing in order to distinguish between a partial dial of a longer code and complete entry of a VSC. In the case of an individual call, the time might seem to be insignificant, but for all of the calls of this type that a switch might process, the total increased occupancy time can be significant. USTA can understand that it is tempting for any company to recommend mandatory implementation of a capability that other entities must bear the burdens to accomplish. The Commission must recognize that enforcement of any such capability on carriers will require extensive additional process to establish cost recovery for those carriers that remain dependent on Commission activity in order to recover their costs. This would be counter to Congressional mandates to lessen regulatory

² Low Tech Designs, Inc., does not reveal any details of its "independent research" to support its assertions.

³ In the context of this proceeding, this requirement would fall not only on incumbent LECs, but on CLECs, cellular and PCS providers as well.

burdens on telecommunications service providers.

I. Section 8.0 "Alternatives"

This section details the options that might be utilized for abbreviated dialing. The Report concluded that either leading or trailing "#" might be usable, and that the leading "*" character should not be used. The uses that are described would not require further development. However, it must be noted that neither the "#" nor the "*" symbols are currently passed on inter-switch links, and internetwork usage would require such passage and would require development of the signaling protocol. Another matter is that switch owners could not control all of the details of service provision, as they now cannot in many of the access structures currently in place (e.g., 900, 976, etc.). Accordingly, the Report observes that specifics of service provision may result in regulatory agency requirements of per code blocking. USTA concurs that such a result is likely. Per code blocking capability would require further development which would include costs of development, and deployment by carriers in areas where required.

J. Section 10.0 "Additional Considerations"

The issues in this section that relate to different methods by which calls would be billed are particularly critical for the Commission to consider. It is very likely that multiple service providers would want to provide services on both calling and called party pays bases, and the conditions for such provision would have to be considered and resolved before implementation could be accomplished.

III. Comments on Minority Opinions

A. Low Tech Designs, Inc.

USTA responded to Low Tech's comments concerning dialing formats in Section II (C) above and will not repeat those observations here. USTA addresses Low-Tech's allegations that the process was "LEC and wireless dominated", that the "#" symbol should not be used because of the many rotary telephones in use, and that there has been a lack of AIN development work and planning.

1. The Role of LEC and Wireless Carriers in the Process

The meetings considering adoption of the Report were conducted as an activity of NANC. At each NANC meeting, reports were made concerning the progress being made on these issues. The leadership repeatedly brought to the attention of the Council concerns that it would prefer to have broader participation. The Council members include representatives from all interested industry segments; all of these representatives were fully aware of the issues under discussion and issues of representation. Any representative who wanted to be heard was accommodated.

The issues at hand have significant implications for the networks of local exchange carriers and their costs of doing business. In recognition of this, those carriers were well represented. There was effective representation by wireless carriers in meetings, and interexchange carriers and others (including Low Tech) were also represented. The fact that Low Tech was present at most of these meetings, and that thoughtful consideration was given to Low Tech's positions, is evidence that industry representatives who wish to

participate in these meetings are heard. All positions were heard and given careful consideration.

The objective of this activity was to develop a record of information and conclusions based on valid information. The fact is that the Report of the Working Group is a valid recommendation of industry experts who understand the issues. It is a valid result from the best minds in the industry. Low Tech's effort to discredit the result by charging that the process was dominated by LECs and wireless carriers is baseless and should be dismissed.

2. Effect of the Use of the “#” Symbol with Rotary Telephones

The argument that the “#” symbol should not be used because of the number of rotary telephones still in service is beginning to wear thin. It is true that the “*” symbol can be duplicated by dialing a 1 1 sequence, and there is no alternate set of dialed digits to represent the “#” symbol. USTA believes that the absence of an alias in digits for the “#” symbol should not continue to be used as an excuse against its use in abbreviated dialing sequences. All wireless telephones have these symbols available, and all telephones having DTMF pads (except some of the earliest ones) can generate the tone pair that represents this symbol. It is unlikely that any service location that would have a need to access services of this type would not have at least one telephone that could be used to enter codes using the “#” symbol. The inability of some instruments to transmit the “#” symbol should no longer be a valid reason to argue that the “*” symbol is the only non-numerical symbol that can be employed.

3. AIN Development Work and Planning

At many points in the Work Group discussion, it was asserted that AIN service structures are the answer to the needs of the service providers. Repeatedly, the LECs asked those who advocated that AIN was the answer to their needs to describe the service structure that was intended so that the capabilities needed could be evaluated. The only response to these inquiries were generalized statements. Whether the question could not or would not be answered is still not clear, but no service structure that could be evaluated was ever proposed. If a service structure were described, it could have been evaluated for its development implications, cost, and time to deploy.

Development of an AIN capability that could be deployed on a national basis over many different types of equipment is not a trivial task, and such development could be costly and time consuming. This is the case when the service structure that is being developed is well documented and understood. To charge that the LECs should engage in development activity to support capabilities that cannot be defined, and whose value is unknown is ludicrous.

B. MCI Worldcom

MCI Worldcom begins its minority opinion by stating as fact the conclusion that the majority of the working group participants "did not intend to address the task assigned, but rather intended to restrict others (e.g. ISPs, CLECs) from developing necessary and needed expanded national abbreviated dialing requirements." USTA takes vigorous exception to this statement which is an opinion without support and is not true. Rather than

predisposition, USTA submits that the consensus conclusions of the Working Group that are stated in the Report were the result of rational process within the processes and procedures as practiced in the industry. The positions taken by MCI Worldcom are without merit and must fail because they cannot withstand the pressure of reasoned inquiry.

MCI Worldcom also seems to express indignation that some capabilities will not be deployed by the LECs without a regulatory mandate. These positions are characteristic of those in the industry who have made a practice of making demands that other carriers deploy capabilities that have business value only to their competitors. USTA believes that any rational business would be unwilling to deploy capabilities without a valid business case or other compensation. MCI Worldcom also repeats the unbalanced representation charge which has been addressed in Section III (A)(1) above.

IV. Conclusion

The North American Numbering Council formed the Abbreviated Dialing Ad Hoc Working Group to respond to the question of the length of time it would take to deploy abbreviated dialing capabilities in the network. Those industry representatives who had an interest in the issue were given full opportunity to participate. At the final Working Group meeting, manufacturers of the switching equipment that would be involved participated to advise the group of the implications on development and deployment of the elements under consideration.

The Working Group evaluated the different options available in order to determine

which of the capabilities were practical and useful. Participants found that most of the options that were suggested were undesirable for various reasons. Those reasons are detailed in the Report. In Section 12.0 "Conclusion," the formats recommended include either a leading and/or trailing "#" symbol with other conditions stated. In direct response to the Commission's question, the Report states that implementation of these formats would require about two years after the time that the industry determines to use the specific arrangement. Other conditions that would affect such deployments have been investigated and discussed in the Report.

USTA submits that the Report of the Abbreviated Dialing Ad Hoc Working Group of the NANC has answered the Commission's question and should be adopted.

USTA also observes that the information provided illustrates the difficulty in implementation of any uniform abbreviated dialing arrangement when the basic resource has been in use for many years and subject to various uncontrolled and uncoordinated uses. The opportunity to uniformly implement abbreviated dialing codes without subjecting one or another existing users to painful dislocation is limited to a very small resource. Uniform implementation of that resource would take years and extensive development and coordination work in the industry. The relative scarcity of the resource can be expected to result in extensive debate and discord in the proceedings.

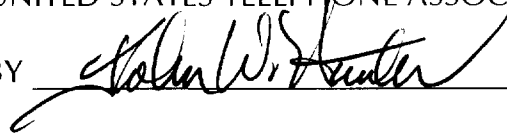
The industry is currently involved in extensive work and development relative to numbering. We face new challenges in implementation of number pooling administration of the North American Numbering Plan (NANP), and the possible exhaust of the basic 10

digit numbering resource in the North American region. USTA believes that the Report shows that the possible benefit of establishing uniform abbreviated dialing arrangements in order to support development of "designer telephony" options is limited, and the amount of effort that would be required to do so would be enormous. USTA observes that the industry has not yet established uniform dialing procedures for the existing 10 digit resource. USTA believes that, in addition to answering the Commission's specific question regarding time for implementation, the Report provides tangible support for the conclusion that the effort to implement uniform multinetwork abbreviated dialing procedures is not an appropriate use of industry resources at this time.

Respectfully submitted,

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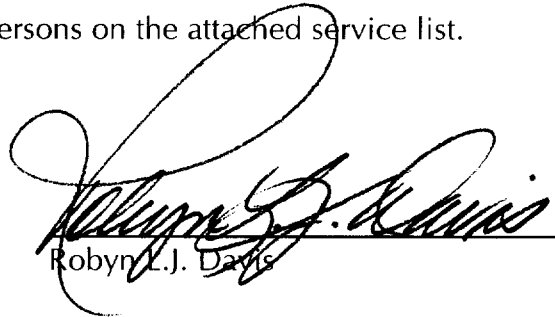
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January 13, 1999

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on January 13, 1999 copies of the Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



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